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Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JANE ROE, an individual; MARY ROE, an individual; SUSAN ROE, an individual; JOHN ROE, an individual; BARBARA ROE, an individual; PHOENIX HOTEL SF, LLC, a California limited liability company; FUNKY FUN, LLC, a California limited liability company; and 2930 EL CAMINO, LLC, a California limited liability company,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO, a California public entity,

Defendant.

Case No. 4:24-cv-01562-JST

DECLARATION OF ABIGAIL WALD IN SUPPORT OF DEFENDANT CITY AND COUNTY OF SAN FRANCISCO'S OPPOSITION TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Hearing Date: October 27, 2025
Time: 8:30 a.m.
Place: Courtroom 6, 2nd Floor
1301 Clay Street
Oakland, CA 94612

Trial Date: August 10, 2026

Attachments: Exhibits 1-43

1 I, ABIGAIL H. WALD, hereby declare:

2 1. I am a member of the bar of the state of California and counsel of record for defendant
3 City and County of San Francisco. I submit this declaration to support San Francisco' Opposition to
4 Plaintiffs' Motion for Preliminary Injunction. If called as a witness, I could and would testify
5 competently to the matters set forth herein.

6 **Deposition Excerpts and Exhibits**

7 **Jane Roe**

8 2. Attached as **Exhibit 1** is a true and correct copy of excerpts of the deposition transcript
9 for Plaintiff Jane Roe, taken on September 8, 2025.

10 3. Attached as **Exhibit 2** is a true and correct copy of Exhibit Q from the deposition of
11 Plaintiff Jane Roe, taken on September 8, 2025.

12 4. Attached as **Exhibit 3** is a true and correct copy of Exhibit R from the deposition of
13 Plaintiff Jane Roe, taken on September 8, 2025.

14 5. Attached as **Exhibit 4** is a true and correct copy of Exhibit S from the deposition of
15 Plaintiff Jane Roe, taken on September 8, 2025.

16 6. Attached as **Exhibit 5** is a true and correct copy of Exhibit T from the deposition of
17 Plaintiff Jane Roe, taken on September 8, 2025.

18 7. Attached as **Exhibit 6** is a true and correct copy of Exhibit U from the deposition of
19 Plaintiff Jane Roe, taken on September 8, 2025.

20 8. Attached as **Exhibit 7** is a true and correct copy of Exhibit V from the deposition of
21 Plaintiff Jane Roe, taken on September 8, 2025.

22 9. Attached as **Exhibit 8** is a true and correct copy of Exhibit W from the deposition of
23 Plaintiff Jane Roe, taken on September 8, 2025.

24 10. Attached as **Exhibit 9** is a true and correct copy of Exhibit X from the deposition of
25 Plaintiff Jane Roe, taken on September 8, 2025.

26 11. Attached as **Exhibit 10** is a true and correct copy of Exhibit Y from the deposition of
27 Plaintiff Jane Roe, taken on September 8, 2025.

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John Roe

12. Attached as **Exhibit 11** is a true and correct copy of excerpts of the deposition transcript for Plaintiff John Roe, taken on September 9, 2025.

13. Attached as **Exhibit 12** is a true and correct copy of Exhibit 3 from the deposition of Plaintiff John Roe, taken on September 9, 2025.

14. **Exhibit 13** is intentionally omitted.

Barbara Roe

15. Attached as **Exhibit 14** is a true and correct copy of excerpts of the deposition transcript for Plaintiff Barbara Roe, taken on September 12, 2025.

16. Attached as **Exhibit 15** is a true and correct copy of Exhibit 2 from the deposition of Plaintiff Barbara Roe, taken on September 12, 2025.

17. Attached as **Exhibit 16** is a true and correct copy of Exhibit 3 from the deposition of Plaintiff Barbara Roe, taken on September 12, 2025.

18. Attached as **Exhibit 17** is a true and correct copy of Exhibit 4 from the deposition of Plaintiff Barbara Roe, taken on September 12, 2025.

19. Attached as **Exhibit 18** is a true and correct copy of Exhibit 5 from the deposition of Plaintiff Barbara Roe, taken on September 12, 2025.

20. Attached as **Exhibit 19** is a true and correct copy of Exhibit 6 from the deposition of Plaintiff Barbara Roe, taken on September 12, 2025.

21. Attached as **Exhibit 20** is a true and correct copy of Exhibit 14 from the deposition of Plaintiff Barbara Roe, taken on September 12, 2025.

22. Attached as **Exhibit 21** is a true and correct copy of Exhibit 15 from the deposition of Plaintiff Barbara Roe, taken on September 12, 2025.

Mary Roe

23. Attached as **Exhibit 22** is a true and correct copy of excerpts of the deposition transcript for Plaintiff Mary Roe, taken on September 15, 2025.

24. Attached as **Exhibit 23** is a true and correct copy of Exhibit 2 from the deposition of Plaintiff Mary Roe, taken on September 15, 2025.

25. Attached as **Exhibit 24** is a true and correct copy of Exhibit 3 from the deposition of Plaintiff Mary Roe, taken on September 15, 2025.

26. Attached as **Exhibit 25** is a true and correct copy of Exhibit 4 from the deposition of Plaintiff Mary Roe, taken on September 15, 2025.

27. Attached as **Exhibit 26** is a true and correct copy of Exhibit 5 from the deposition of Plaintiff Mary Roe, taken on September 15, 2025.

Phoenix Hotel SF LLC and Funky Fun LLC

28. Attached as **Exhibit 27** is a true and correct copy of excerpts of the deposition transcript for Isabel Manchester, who served as the corporate representative for Plaintiffs Phoenix Hotel SF LLC and Funky Fun LLC, taken on September 17, 2025.

29. Attached as **Exhibit 28** is a true and correct copy of Exhibit 12 from the deposition of Isabel Manchester, who served as the corporate representative for Plaintiffs Phoenix Hotel SF LLC and Funky Fun LLC, taken on September 17, 2025.

30. Attached as **Exhibit 29** is a true and correct copy of Exhibit 16 from the deposition of Isabel Manchester, who served as the corporate representative for Plaintiffs Phoenix Hotel SF LLC and Funky Fun LLC, taken on September 17, 2025.

Best Western

31. Attached as **Exhibit 30** is a true and correct copy of excerpts of the deposition of Sam Patel, who served as the corporate representative for Plaintiff Best Western, taken on September 18, 2025.

32. Attached as **Exhibit 31** is a true and correct copy of Exhibit 9 from the deposition of Sam Patel, who served as the corporate representative for Plaintiff Best Western, taken on September 18, 2025.

33. Attached as **Exhibit 32** is a true and correct copy of Exhibit 10 from the deposition of Sam Patel, who served as the corporate representative for Plaintiff Best Western, taken on September 18, 2025.

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34. Attached as **Exhibit 33** is a true and correct copy of Exhibit 11 from the deposition of Sam Patel, who served as the corporate representative for Plaintiff Best Western, taken on September 18, 2025.

35. Attached as **Exhibit 34** is a true and correct copy of Exhibit 14 from the deposition of Sam Patel, who served as the corporate representative for Plaintiff Best Western, taken on September 18, 2025.

36. Attached as **Exhibit 35** is a true and correct copy of Exhibit 15 from the deposition of Sam Patel, who served as the corporate representative for Plaintiff Best Western, taken on September 18, 2025.

37. Attached as **Exhibit 36** is a true and correct copy of Exhibit 20 from the deposition of Sam Patel, who served as the corporate representative for Plaintiff Best Western, taken on September 18, 2025.

38. Attached as **Exhibit 37** is a true and correct copy of Exhibit 21 from the deposition of Sam Patel, who served as the corporate representative for Plaintiff Best Western, taken on September 18, 2025.

Additional Documents

39. Attached as **Exhibit 38** is a true and correct copy Google image of the area in front of 380 Eddy Street dated January 2025.

40. Attached as **Exhibit 39** is a true and correct copy the website for the National Harm Reduction Coalition article titled “California Harm Reduction Initiative (CHRI) Grantmaking and Capacity-Building for California Syringe Service Programs,” available at <https://harmreduction.org/our-work/action/california-harm-reduction-initiative-chri/>. This website includes a list of organizations that are qualified as SSPs.

41. Attached as **Exhibit 40** is a true and correct copy a press release from the Office of the Mayor, dated February 12, 2025 titled “Mayor Lurie Signs Fentanyl State of Emergency Ordinance, Announces Plan For 24/7 Police Friendly Stabilization Center,” available at <https://www.sf.gov/mayor-lurie-signs-fentanyl-state-of-emergency-ordinance-announces-plan-for-247-police-friendly-stabilization-center>.

42. Attached as **Exhibit 41** is a true and correct copy of a press release from the Office of the Mayor, dated April 24, 2025, titled “Mayor Lurie Delivers on Key Commitment, Opening 24/7 Police-Friendly Stabilization Center to Provide Urgent Care for People in Crisis,” available at <https://www.sf.gov/news-mayor-lurie-delivers-on-key-commitment-opening-247-police-friendly-stabilization-center-to-provide-urgent-care-for-people-in-crisis>.

43. Attached as **Exhibit 42** is a true and correct copy of a press release from the Office of the Mayor, Department of Public Health, and Department of Homelessness and Supportive Housing, dated April 30, 2025, titled “Mayor Lurie Opens 279 New Recovery And Treatment Beds, Delivering Significant Progress On His ‘Breaking The Cycle’ Vision For Tackling Homelessness And Behavioral Health Crisis,” available at <https://www.sf.gov/news-mayor-lurie-opens-279-new-recovery-and-treatment-beds-delivering-significant-progress-on-his-breaking-the-cycle-vision-for-tackling-homelessness-and-behavioral-health-crisis?preview=true&ts=20250430140629>.

44. Attached as **Exhibit 43** is a true and correct copy of the 2018 amendments to AB 1810.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed on September 22, 2025, at San Francisco, California.

/s/Abigail H. Wald

ABIGAIL H. WALD